

REMARKS

By this Amendment, Applicants amend claims 1, 7, and 13 to more appropriately define the invention. Applicants also amend claims 8, 10-12, and 18 to make minor corrections and not for reasons related to patentability. Claims 1, 2, 4-8, 10-14, and 16-18 remain currently pending.

In the Office Action, the Examiner rejected claims 1, 2, 4-8, 10-14, and 16-18 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,185,860 to Wu ("Wu") in view of U.S. Patent No. 7,280,999 to Chung et al. ("Chung").¹

Applicants respectfully traverse the rejection of claims 1, 2, 4-8, 10-14, and 16-18 under 35 U.S.C. § 103(a) as being unpatentable over Wu in view of Chung, because a *prima facie* case of obviousness has not been established.

To establish a *prima facie* case of obviousness based on a combination or suggestion of prior art, "Office personnel must articulate . . . a finding that the prior art included each element claimed, although not necessarily in a single prior art reference, with the only difference between the claimed invention and the prior art being the lack of actual combination of the elements in a single prior art reference." M.P.E.P. § 2143.A (8th edition, revision 6).

Independent claim 1, as amended, recites a combination including, for example,

a node information storing unit configured to store a node information containing a name of a node, a network identification information, a prefix indicating a position of a node on the network, and an interface identification

¹ The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

information of a node, for each node [which is connected to a network and whose position on the network can be changed]; . . .

a node information updating unit configured to update the node information stored in the node information storing unit, according to the node information of the other nodes collected by the node information collecting unit, by updating the prefix stored in the node information storing unit by using the interface identification information contained in the node information collected by the node information collecting unit as a key.

Wu fails to teach or suggest at least these features of amended claim 1.

Wu discloses “a computer network node discovery system that provides a general way of discovering network elements, or nodes, connected to a computer network, and a specific algorithm for discovering nodes connected to a TCP/IP network.” (Wu, Abstract) “Block 604 then initializes the database used to permanently store the nodes, and loads node list from existing entries in the database.” (Wu, column 5, lines 58-60.) However, Wu’s mere mention of a node discovery system and a database for storing the nodes does not constitute “a node information storing unit configured to store a node information containing a name of a node, a network identification information, a prefix indicating a position of a node on the network, and an interface identification information of a node, for each node [which is connected to a network and whose position on the network can be changed],” as recited in amended claim 1 (emphasis added).

In fact, Wu does not even mention any prefix. Wu also fails to teach or suggest “a node information updating unit configured to update the node information stored in the node information storing unit, according to the node information of the other nodes

collected by the node information collecting unit, by updating the prefix stored in the node information storing unit by using the interface identification information contained in the node information collected by the node information collecting unit as a key,” as recited in amended claim 1 (emphasis added).

Chung fails to cure the deficiencies of Wu. Chung merely describes resolving a network address associated with a target domain name label by calculating a hash value of the target domain name label and comparing the calculated hash value with a hash value of each address name label recorded in database, where a plurality of address name labels, which are defined using a plurality of characters differing from one another, is associated with a common network address, and hash values of the plurality of address name labels are registered in the database. (See column 5, line 41 – column 9, line 64, Figs.1 to 5). However, Chung’s teaching of resolving a network address does not constitute “a node information storing unit configured to store a node information containing a name of a node, a network identification information, a prefix indicating a position of a node on the network, and an interface identification information of a node, for each node [which is connected to a network and whose position on the network can be changed],” as recited in amended claim 1 (emphasis added).

Chung mentions that “the character set identifier 404 includes a 2-bit prefix portion 404a which indicates to the network address server 200 that the data packet 400 includes non-ASCII characters.” (Chung, column 8, lines 29-32, emphasis added). However, Chung’s teaching of a character type prefix does not constitute “a node information updating unit configured to update the node information stored in the node

information storing unit, according to the node information of the other nodes collected by the node information collecting unit, by updating the prefix stored in the node information storing unit by using the interface identification information contained in the node information collected by the node information collecting unit as a key,” as recited in amended claim 1 (emphasis added). In fact, Chung teaches away using a prefix for “indicating a position of a node on the network.”²

Therefore, Wu and Chung fail to teach or suggest all claim elements of amended claim 1, and a *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully request withdrawal of the Section 103(a) rejection of amended claim 1. Because claims 2 and 4-6 depend from claim 1, Applicants also request withdrawal of the Section 103(a) rejection of claims 2 and 4-6 for at least the same reasons stated above.

Further, amended independent claims 7 and 13, while of different scope, include similar recitations to those of amended claim 1. Amended claims 7 and 13 are therefore also allowable for at least the same reasons stated above with respect to amended claim 1. Applicants respectfully request withdrawal of the Section 103(a) rejection of amended claims 7 and 13, and of claims 8 and 10-12 and claims 14 and 16-18, which depend from claim 7 or 13.³

² Chung does not focus on a situation in which a position of each node on a network can be changed, Thus, Chung fails to teach or suggest a system that provides a way of managing a name of each node which is connected to the network and whose position on the network can be changed, and an address for identifying each node.

³ Wu and Chung also fail to teach or suggest subject matter of dependent claims. For example, Wu and Chung fail to mention “IPv6” as recited in claims 6, 12, and 18.


In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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